

MELINDA L. HAAG, SBN CA 132612
 United States Attorney
 DONNA CALVERT, SBN IL 6191786
 Acting Regional Chief Counsel, Region IX
 Social Security Administration
 BRENDA M. PULLIN, SBN CO 35181
 Special Assistant United States Attorney

160 Spear Street, Suite 800
 San Francisco, CA 94105
 Telephone: 415-977-8975
 Fax: 415-744-0134
 E-mail: Brenda.Pullin@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CHARLIE LLOYD III,

Plaintiff,

v.

MICHAEL J. ASTRUE,
 Commissioner of Social Security

Defendant.

CASE NO. 3:11-cv-4902-EMC

STIPULATION AND PROPOSED ORDER
 FOR FIRST EXTENSION OF TIME TO
 FILE DEFENDANT'S CROSS-MOTION

The parties hereby stipulate through counsel, with the Court's approval as indicated by issuance of the attached Order, that Defendant shall have a first extension of time of 30 days to file his cross-motion for summary judgment.

The extension is being sought due to defendant's counsel's workload during the past month coupled with the Social Security Regional Counsel's move to new office space at the end of March 2012—with all the associated preparations, organization, meetings, packing, and unpacking—which have taken more of counsel's time than projected. Defendant's counsel was responsible for moving her own office as well as helping to pack and move common office areas such as the fax and mail center, file areas, and unoccupied cubicles. In addition, after the move, unpacking and technological

1 setup/troubleshooting of computer equipment has required additional unanticipated time and IT
2 assistance before counsel's office has become fully functional.

3 Given these constraints, along with counsel's existing workload, the Commissioner respectfully
4 requests 30 additional days in which to complete the Commissioner's cross-motion. The new due date
5 will be May 30, 2012.

6 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

7 Respectfully submitted,

8 Dated: April 30, 2012

9 /s/ Robert C. Weems
10 (As authorized via e-mail)
11 ROBERT C. WEEMS
12 Attorney for Plaintiff

13 Dated: April 30, 2012

14 MELINDA L. HAAG
15 United States Attorney

16 /s/ Brenda M. Pullin
17 BRENDA M. PULLIN
18 Special Assistant U.S. Attorney

19 IT IS SO ORDERED:

20 Dated: 4/30/12

